

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	CASE NO. 5:17CR00493
	:	
Plaintiff,	:	JUDGE JAMES S. GWIN
	:	
vs.	:	
	:	
JESSE GULLEY,	:	<u>JESSE GULLEY’S SENTENCING</u>
	:	<u>MEMORANDUM</u>
	:	
Defendant.	:	

Defendant Jesse Gulley submits this sentencing memorandum in support of his request for a sentence below the advisory guidelines range with recommended job training and counseling.

Mr. Gulley pleaded guilty to one count of possessing firearms after a felony conviction. The presentence report calculates his advisory guidelines range as 46 to 57 months in prison.

Mr. Gulley accepts responsibility for his conduct and recognizes that he deserves to be punished accordingly. Without excusing his actions, Mr. Gulley’s history and characteristics, and his ongoing, incomplete efforts to overcome that history, are relevant to the Court’s determination of a just punishment.

Mr. Gulley’s parents divorced when he was young, and when he was six or seven years old, his father went to prison for seven years for a drug offense. PSR ¶ 72. He grew up in abject poverty. *Id.* His mother physically abused him, and relatives of his mother’s friends sexually abused him. *Id.* ¶ 73. At 14 years old, he joined a neighborhood gang. *Id.* ¶ 74. As a juvenile and a young adult, he served jail and prison sentences for various offenses.

Since then, Mr. Gulley has taken steps to improve his life and become a positive influence in the community. He is a practicing Muslim and has contributed time and resources to his religious community. *See* Cameron Letter, Ex. A. He created an organization to help underprivileged children and donated supplies and food through his son's school. PSR ¶¶ 78, 80.

Those that know him best describe him as someone with a "big heart," who stands up for people that he sees being abused or bullied, be they friends or strangers. *See* Cox Letter, Ex. B; Sales Letter, Ex. C. They detail things he has done to help people struggling, particularly children in need. *See* Kebbeh Letter, Ex. D. We are submitting these letters, and photographs of some of Mr. Gulley's charitable work, for the court's consideration.

In light of Mr. Gulley's history and his efforts to become a benefit to the community, we respectfully propose that a sentence below the advisory guidelines range would provide just punishment for his offense. Mr. Gulley believes he would benefit from counseling to provide him further support and job training to better prepare him for productive work after his release, and requests that the Court recommend those programs as part of his sentence.

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on June 12, 2018, a copy of the foregoing Sentencing Memorandum was filed electronically. Notice of this filing will be sent by operation of the Court's electronic filing system to all parties indicated on the electronic filing receipt. All other parties will be served by regular U.S. Mail. Parties may access this filing through the Court's system.

/s/ Carlos Warner

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